

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BROOKS,		:
		:
	Plaintiff,	:
-against-		:
		:
FINNEGAN, et al.		:
		:
	Defendants.	:
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22 Civ. 6283 (VB)(JCM)

**DECLARATION OF JEB HARBEN**

I, JEB HARBEN, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge:

1. I am an Assistant Attorney General in the Office of LETITIA JAMES, Attorney General, State of New York, attorney for Defendants herein. I submit this declaration and the exhibits annexed hereto in support of Defendants' Opposition to Plaintiff's Motion to Compel.

2. Attached as Exhibit A is a true and correct copy of the February 19, 2025 e-mail from Jeb Harben to Plaintiff and the attached document (February 13, 2025 letter).

3. Attached as Exhibit B is a true and correct copy of the March 19, 2025 e-mail from Jeb Harben to Plaintiff and the attached document (Defendants' February 13, 2025 responses to Plaintiff's discovery demands).

4. Attached as Exhibit C is a true and correct copy of the March 20, 2025 e-mail from Jeb Harben to Plaintiff and the attached March 20, 2025 Declaration of Amanda Nissen.

5. Attached as Exhibit D is a true and correct copy of the March 20, 2025 e-mail from Plaintiff to Jeb Harben responding to the prior e-mail of Jeb Harben.

6. Attached as Exhibit E is a true and correct copy of Defendants' Rule 26 Initial Disclosures.

7. Attached as Exhibit F is a true and correct copy of the document demands directed to Defendant Finnegan by Plaintiff, which are substantially the same as the document demands directed to Defendants Wollman and Gould.

8. Attached as Exhibit G is a true and correct copy of the March 7, 2025 e-mail from Jeb Harben to Plaintiff and the attached redaction/privilege log.

9. Attached as Exhibit H is a true and correct copy of the February 25, 2025 e-mail from Jeb Harben to Plaintiff.

WHEREFORE, for the reasons stated in the attached Memorandum of Law and other submissions made herein, Defendants respectfully request that this Court deny Plaintiff's motion to compel.

*/s/Jeb Harben*

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Jeb Harben

Executed: March 21, 2025  
New York, New York